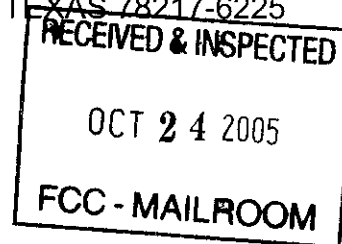




Office of Management Information
Services

North East Independent School District

DOCKET FILE ONLY ORIGINAL
8961 TESORO DRIVE - SAN ANTONIO, TEXAS 78217-6225



October 13, 2005

To Whom It May Concern:

From: Steven Emilienburg, Executive Director, Management Information Services *SPV*

Re: CC Docket No. 02-6

I have received several denial letters for the SLD for my appeal for not filing the form 471 certification letters within the filing window. I admit that my certification letters were not filed within the window but would like to point out the following items:

1. I electronically filed the FRN's with a login supplied by the SLD. What is the purpose of the 471 certification when the SLD knows for a fact I filed these FRN' and thus approved them. The SLD even emails me every time I use my login to file.
2. The SLD and the FCC both "strongly recommend that you use the electronic filing methods". Where does the 471 certification fit in this scenario when they already know (based on login) what you have filed for? The 471 certification seems to be an unnecessary step.
3. I feel that priority one 1 requests should not be denied based on the 471 certification. An example of how they are not treated the same as non-priority 1 requests is in the fact that "late" priority 1 requests will be considered after other SLD obligations are fulfilled.
4. Regardless of how the FCC rules on this request, please consider eliminating the 471 certification filing on FRN's that were filed electronically.

Thank you for your consideration.

Steven Emilienburg
Steven Emilienburg, Executive Director, Management Information Services
North East Independent School District
8961 Tesoro, Suite 517
San Antonio, Texas 78217

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